

### REMARKS

Claims 15-18, 20, 21, 25, 26, 31-34, 36, 37, 39-45 and 47-54 are pending in the application. Claims 19, 22-24, 35, 38 and 46 have been cancelled without prejudice or disclaimer of the subject matter therein. The Examiner is respectfully requested to reconsider and withdraw the rejections in view of the amendments and remarks herein.

#### *Claim Rejections -- 35 U.S.C. § 112*

Claims 15-22, 24-26 and 31-48 stand rejected under 35 U.S.C. § 112, first paragraph, because the specification, while showing adequate written description for simplification by redundancy or transitivity, allegedly does not reasonably provide written description to all other methods of constraint simplification. This rejection is respectfully traversed.

Although Applicants strongly disagree with the propriety of this rejection, claims 15, 31 and 41 have been amended to incorporate subject matter of claim 23. Consequently, claim 23 has been canceled without prejudice or disclaimer of the subject matter therein. Each of claims 15, 31 and 41 have been so amended solely in an effort to advance prosecution of the instant patent application. Reconsideration and withdrawal of the rejections are respectfully requested.

#### *Claim Rejections -- 35 U.S.C. § 103*

Claims 15-26 and 31-48 stand rejected under 35 U.S.C. § 103(a) as being obvious over Shazia Sadiq et al., "Pockets of Flexibility in Workflow Specification," *Proceedings of the 20<sup>th</sup> International Conference on Conceptual Modeling, Lecture Notes In Computer Science*, 2224, pp. 513-526 (H.S. Kunii, et al.) in view of Ribeiro et al., *Security Policy Consistency*, IST/INESC, Lisbon, Portugal, 30 Jun. 2000, pg. 1-13 ("Ribeiro"). This rejection is respectfully traversed.

At the outset, Applicants note that claims 19, 22-24, 35, 38 and 46 have been cancelled without prejudice or disclaimer. Consequently, the rejection of claims 19, 22-24, 35, 38 and 46 has been rendered moot.

Each of claims 15, 31 and 41, as amended herein, includes the features of simplifying a specification of constraints for each constraint based on resolving intra-constraint conflicts for each constraint type to provide a minimal specification for each constraint of the constraint type, and resolving inter-constraint conflicts between the constraint types. Support for the amendments to claims 15, 31 and 41 can be found throughout the application as originally filed (see, for example, Fig. 15 and ¶¶ [0132]-[0139]). As discussed in further detail herein, Sadiq fails to disclose at least these features of each of claims 15, 31 and 41, and Ribeiro fails to cure the deficient disclosure of Sadiq.

In general, Sadiq provides an introduction to pockets of flexibility in a workflow specification. While Sadiq discusses constraints, Sadiq fails to disclose how a specification of the constraints might be simplified, and fails to disclose resolution of intra-constraint conflicts for each constraint type and inter-constraint conflicts between constraint types. Ribeiro is not asserted as disclosing, nor does Ribeiro disclose, the above-discussed features of each of claims 15, 31 and 41. Consequently, Ribeiro fails to cure the deficient disclosure of Sadiq.

For at least the foregoing reasons, Sadiq and Ribeiro, taken either alone or in combination, fail to disclose or render obvious each and every feature of claims 15, 31 and 41. Therefore, reconsideration and withdrawal of the rejections are respectfully requested.

Each of claims 16-18, 20, 21, 25, 26, 32-34, 36, 37, 39, 40, 42-45, 47 and 48 ultimately depends from one of claims 15, 31 and 41, which define over the asserted references, as discussed in detail above. Consequently, each of claims 16-18, 20, 21, 25, 26, 32-34, 36, 37, 39, 40, 42-45, 47 and 48 also defines over the asserted references for at least the same reasons. Therefore, reconsideration and withdrawal of the rejections are respectfully requested.

#### Other Claim Amendments

Claims 49-54 have been added. Each of claims 49-54 ultimately depends from one of claims 15, 31 and 41, which define over the asserted references, as discussed in detail above. Consequently, each of claims 49-54 also defines over the asserted references for at least the same reasons. Further, each of claims 49-54 recites features that are neither disclosed nor rendered

obvious by the asserted references. Consequently, each of claims 49-54 are allowable in their own right. Therefore, favorable consideration and allowance of each of claims 49-54 are respectfully requested.

### CONCLUSION


It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reason for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to amendment. Applicants respectfully request consideration of all filed IDS' not previously considered, by initialing and returning each Form 1449.

The undersigned attorney welcomes the opportunity to further discuss by telephone any position or issue not fully addressed by the above remarks and amendments.

Applicants request a one-month extension of time. All fees are being paid concurrently herewith on the Electronic Filing System (EFS) by way of Deposit Account authorization. Please apply all charges or credits to Deposit Account No. 06-1050, referencing Attorney Docket No. 13909-0115001.

Respectfully submitted,

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